

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: NIKOLAY G TANCHEV
RADA I TANCHEV

) Case No. 15 B 42606
)
Debtors) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

NIKOLAY G TANCHEV
RADA I TANCHEV
2206 S SCOTT ST
DES PLAINES, IL 60018

SULAIMAN LAW GROUP LTD
via Clerk's ECF noticing procedures

Please take notice that on April 20, 2016 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on February 24, 2016.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On December 17, 2015 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend schedules I & J, file lienstrip pleading & amend
section E3.2 of plan to reflect lienstrip

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn